

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

THE NAUGHTYS LLC

Plaintiff,

v.

DOES 1-580

Defendants

Civil Action No. 4:21-CV-00492-O

PLAINTIFF'S SUPPLEMENTAL STATUS REPORT

The Naughtys LLC ("Plaintiff") files this Supplemental Status Report pursuant to this Court's July 2, 2021 order ("Order," Dkt. 114, PageID 12508) to detail the diligence Plaintiff has taken to serve the Defendants under the Hague Convention.

On August 2, 2021, Plaintiff provided an interim status report regarding the status of service on Defendants (Dkt. 130), which included preliminary results of boots-on-the-ground investigations of the alleged Defendant addresses provided by the third-party e-commerce sites affiliated with the Defendants (the "Marketplaces"). Plaintiff now files this Supplemental Status Report to provide the Court with the most up-to-date data regarding the investigation of these Defendant addresses.¹

In total, Plaintiff has investigated 178 Defendant addresses. The results of said investigations to-date are as follows:

¹ As a reminder, none of the Defendants have provided Plaintiff with all of the information required by the June 9, 2021 Order on Preliminary Injunction (Dkt. 81), so Plaintiff has been unable to ascertain the extent of the Defendants' true addresses.

- **Verified:** One Defendant (Doe #406) was located at the physical address provided by the Marketplace.
- **Fake Addresses:** 141 Defendant addresses were not true addresses of the Defendants—likely because they are trying to evade service or disruption of their infringing operations. Many of the addresses provided to Plaintiff referred to locations that simply did not exist—for example, referring to the 15th floor for a building with only 4 floors. Other addresses investigated were determined to be a hospital, a fire department, demolished buildings, buildings still under construction and unoccupied, and businesses that are in no way, shape, or form the Defendants’ physical address, such as salons, restaurants, kindergartens, insurance companies, and hotels.
- **Inconclusive:** 36 addresses investigated produced inconclusive results. These investigations generally found residences where nobody answered the door, therefore, Plaintiff is unable to determine whether the Defendant was operating from that physical location.

For the Court’s convenience, attached hereto with this Status Report as Exhibit 1 is a summary of investigations completed to-date and the outcomes of said investigations. So far, only .005% of the 178 Defendants investigated were located and verified by investigators on the ground. Exhibit 2, attached hereto, is a compilation of investigative reports on the alleged Defendant addresses investigated since Plaintiff’s last status update on August 2, 2021.

Plaintiff is diligently taking steps to comply with the Court’s Order regarding Hague Convention Service and continues to attempt to verify the accuracy of the various addresses provided by the Marketplaces. Plaintiff will continue its diligence and will again update the Court on its efforts, pursuant to the Order, by August 16, 2021.

Dated: August 12, 2021

Respectfully submitted,
CREEDON PLLC

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ATTORNEYS FOR PLAINTIFF
THE NAUGHTYS LLC

CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2021, I caused a true and correct copy of the foregoing to be filed on the Court's CM/ECF system, which served notice on all counsel of record.

By: /s/ Charles A. Wallace
Charles A. Wallace